

**SIN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

**UNITED STATES OF AMERICA *ex rel.*
SHERETTE RHODES & ALISA MOSLEY,**

Plaintiffs,

v.

**CAPITAL TECHNOLOGY
INFORMATION SERVICES, INC., *et al.*,**

Defendants.

Civil Action No. TDC-17-0609

**UNITED STATES OF AMERICA *ex rel.*
CONNIE EZERSKI,**

Plaintiffs,

v.

CTIS, INC., ET AL.,

Defendants.

Civil Action No. TDC-18-0486

JOINT STIPULATION OF DISMISSAL

Pursuant to Fed. R. Civ. P. 41(a)(1) and the federal False Claims Act, 31 U.S.C. § 3730(b)(1), the parties, through their undersigned counsel, hereby stipulate to the dismissal of this action, as outlined below, consistent with the terms of the parties' *qui tam* settlement agreement dated June 14, 2023, ("Qui Tam Settlement Agreement"), and the terms of the agreement between Defendants and the Rhodes Relators dated May 30, 2023 ("Rhodes Settlement Agreement") (collectively "Settlement Agreements").

More specifically, pursuant to the Settlement Agreements, the dismissal is as follows:

1. The dismissal shall be with prejudice as to the claims of the United States arising from the Covered Conduct as defined in the Qui Tam Settlement Agreement, and without prejudice as to the United States as to any other claims against Defendants;
2. The dismissal shall be with prejudice as to the Rhodes Relators as to all claims against the Defendants to include claims for reasonable attorneys' fees and costs under 31 U.S.C. § 3730(d) and retaliation pursuant to 31 U.S.C. § 3730(h); and
3. The dismissal shall be with prejudice as to the Ezerski Relator as to all claims against the Defendants to include claims for reasonable attorneys' fees and costs under 31 U.S.C. § 3730(d).

Respectfully submitted,

EREK L. BARRON

By: /s/
TARRA DeSHIELDS (Bar No. 07749)
Assistant United States Attorney
Office of the United States Attorney
36 South Charles St., 4th Floor
Baltimore, MD 21201
Tel: (410) 209-4800
Counsel for the United States

By: /s/
R. Scott Oswald, Esq.
Janel Quinn, Esq.
The Employment Law Group, P.C.
1717 K St. NW, Suite 1110
Washington, D.C. 20006
Tel: (202) 261-2813
soswald@employmentlawgroup.com
jquinn@employmentlawgroup.com
Counsel for Rhodes Relators

By: /s/
Stephen J. Obermeier, Esq.

Wiley Rein, LLP
2050 M. St., NW
Washington, D.C. 20036
Tel: (202) 719-7000
sobermeier@wiley.law
Counsel for Ezerski Relator

By: /s/
Richard Vacura, Esq.
King & Spalding, LLP
1650 Tysons Blvd., Suite 400
McLean, VA 22102
Tel: (703) 245-1018
rvacura@kslaw.com
Counsel for Defendant CTIS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 6, 2023, a true and correct copy of the foregoing was served via electronic mail on all parties of record.

/s/
Tarra DeShields
Assistant United States Attorney